

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION

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Ahmed Jamal Khan,

Plaintiff,

Case No. 2:18-cv-01952-JPS

vs.

United Ground Express,

Defendant.

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**JOINT RULE 26(f) REPORT**

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The parties, Ahmed Jamal Khan (“Plaintiff” or “Khan”) and Defendant United Ground Express (the “Defendant”), submit this Joint Rule 26(f) report pursuant to Local Rule 16. Pursuant to Rule 26(f), a joint meeting was held on February 4, 2019 and attended by Michael Lueder on behalf of Plaintiff and Sean Scullen on behalf of Defendant.

**A. Brief Summary of Nature of Case; Preliminary Injunction**

Plaintiff’s complaint alleges race, national origin, religion and color discrimination and retaliation in violation of Title VII of the Civil Rights Act and 42 U.S.C. § 1981. Plaintiff was held to different standards than Caucasian employees and was discharged when he allegedly violated those standards. Plaintiff also complained of discriminatory treatment and for that he was fired. Defendants denies these allegations.

**B. Rule 26 Information**

1. **Rule 16(b) Scheduling Conference.** A Scheduling Conference is set for February 7, 2019 at 9:00.

2. **Possibility of Settlement.** During the Rule 26(f) Conference, counsel for the parties discussed the potential for early settlement. The parties do not believe this case can be settled at this stage.

3. **Rule 26(a)(1) Disclosures.** The parties agreed to exchange their initial disclosures on February 22, 2019.

4. **Need for Protective Order.** Defendant will likely produce information it views as confidential and will seek a standard protective order regarding the production of confidential documents. The parties expect to present a proposed order to the Court within the next six weeks.

5. **Discovery Issues.** The parties do not anticipate any discovery issues.

6. **Case Schedule.**

The parties propose the following case schedule:

Event	Proposed Date
Deadline to serve Initial Disclosures	February 22, 2019
Deadlines to add additional parties and to amend pleadings without leave of Court	March 1, 2019
Close of Fact Discovery	July 19, 2019
Designation of Expert Witnesses and Exchange of Initial Expert Reports for which party bears burden	July 12, 2019
Designation of Rebuttal Experts and exchange of Rebuttal Expert Reports	August 2, 2019
Close of Expert Discovery	August 16, 2019
Deadline to file Dispositive Motions	August 30, 2019
Trial	TBD

**C. Modifications to Limitation on Discovery Imposed by the Federal Rules**

The parties propose no changes to the Federal Rules of Civil Procedure.

#### **D. Privilege Issues**

The parties wish the court to enter a Federal Rule of Evidence 502(d) order. If information protected from disclosure by the attorney-client privilege or work product doctrine is disclosed without intent to waive the privilege or protection, within fourteen (14) days after discovery of the inadvertent production, the producing party may amend its discovery response and notify the other party that such information was inadvertently produced and should have been withheld. Once the producing party provides such notice, the recipient must promptly return the specified information with any copies. The recipient cannot assert that the production waived the privilege protection, however, the recipient does not waive the right to challenge the assertion of the privilege and seek a court order denying such privilege.

#### **E. Electronic Service and Electronic Copies**

The parties consent to service by electronic means as set forth in Federal Rule of Civil Procedure 5(b)(2)(E) and that such service shall be complete upon transmission, provided that the sender does not receive any indication that such electronic transmission was unsuccessful. Service on Plaintiff will be made to at least the following counsel:

HANSEN REYNOLDS LLC  
Michael C. Lueder  
301 N. Broadway  
Suite 400  
Milwaukee, Wisconsin 53202  
Email: [mlueder@hansenreynolds.com](mailto:mlueder@hansenreynolds.com)

Service on Defendants will be made to at least the following counsel:

QUARLES & BRADY LLC  
Sean M. Scullen  
411 E. Wisconsin Ave.  
Suite 2400  
Milwaukee, Wisconsin 53202-4426  
Email: [sean.scullen@quarles.com](mailto:sean.scullen@quarles.com)

## **F. Electronic Discovery**

The parties agree to discuss and seek agreement on protocols with respect to the identification, review, and production of electronically stored information. Electronically stored information shall be produced in an electronic format to be agreed upon by the parties and on a rolling basis. Each party reserves the right to request any document in color or in native format as needed and such request shall not be unreasonably denied.

Date: February 4, 2019

**HANSEN REYNOLDS LLC**

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